

1 WILMER CUTLER PICKERING HALE AND
2 DORR LLP
3 SONAL N. MEHTA (SBN 222086)
4 sonal.mehta@wilmerhale.com
5 2600 El Camino Real, Suite 400
6 Palo Alto, CA 94306 USA
7 Telephone: 650 600 5051

8 ARI HOLTZBLATT (*pro hac vice*)
9 ari.holtzblatt@wilmerhale.com
10 ALLISON SCHULTZ (*pro hac vice*)
11 Allison.Schultz@wilmerhale.com
12 ROBIN C. BURRELL (*pro hac vice*)
13 robin.burrell@wilmerhale.com
14 1875 Pennsylvania Ave, NW
15 Washington, DC 20006
16 Telephone: (202) 663-6000
17 Facsimile: (202) 663-6363

18 *Attorneys for Plaintiff/Counterclaim Defendant*
19 *Meta Platforms, Inc.*

ANDY R. O'LAUGHLIN (*pro hac vice*)
andy.olaughlin@wilmerhale.com
60 State Street
Boston, MA 02109
Telephone: (617) 526-6220

CINDY PAN (*pro hac vice*)
cindy.pan@wilmerhale.com
250 Greenwich Street
New York, NY 10007
Telephone: (212) 937-7275

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 META PLATFORMS, INC., a Delaware
24 corporation,

25 Plaintiff/Counterclaim Defendant,

26 v.

27 BRANDTOTAL, LTD., an Israel corporation, and
28 UNIMANIA, INC., a Delaware corporation,

Defendants/ Counterclaim Plaintiffs.

Case No. 3:20-CV-07182-JCS

**DECLARATION OF ARI
HOLTZBLATT IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEY'S FEES**

1 I, Ari Holtzblatt, declare:

2 1. I am an attorney duly licensed to practice in the District of Columbia, and admitted to
3 appear *pro hac vice* in this matter. I am a Partner at the law firm of Wilmer Cutler Pickering Hale
4 and Dorr LLP (“WilmerHale”). I represent Plaintiff/Counterclaim Defendant Meta Platforms, Inc.
5 (“Meta”) in the above-captioned matter.

6 2. I submit this declaration in support of Meta’s Motion for Attorney’s Fees. I have
7 personal knowledge of each of the matters stated herein, and if called to testify, would testify
8 consistent with this declaration.

9 **Parties’ Meet and Confers**

10 3. The parties have met and conferred for the purpose of resolving all disputed issues in
11 this litigation, including those presented in this motion on six occasions: June 1, 2022, June 29,
12 2022, July 8, 2022, July 19, 2022, July 27, 2022, and August 3, 2022. In between and following
13 those meetings, the parties have also exchanged numerous emails likewise aimed at resolving these
14 issues.

15 4. On Wednesday, August 10, 2022, I sent counsel to BrandTotal a table setting forth
16 the fixed-fee amounts that Meta paid to WilmerHale for specific categories of work that Meta
17 contends are recoverable. Because Meta paid pursuant to a fixed-fee agreement, those fixed-fee
18 amounts are the fees that Meta actually paid to WilmerHale for the relevant categories of work.

19 5. On Tuesday, August 16, 2022, at BrandTotal’s request, I provided detailed time
20 records that further supported the reasonableness of Meta’s fees.

21 6. Following the August 3, 2022 meeting, I repeatedly requested that the parties again
22 meet and confer regarding the remaining disputed issues in this case, but counsel for BrandTotal
23 indicated that they were not yet prepared to meet again. I informed counsel for BrandTotal that we
24 would welcome a further meeting whenever they are prepared to meet.

25 7. Despite their efforts to resolve the issues presented by this motion, the parties have
26 been unable to reach resolution.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
2 17th day of August, 2022, in Washington, D.C.

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4 By: /s/ Ari Holtzblatt
5 Ari Holtzblatt
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing.
Pursuant to Civil Local Rule 5-1(h), I hereby attest that the other signatories have concurred in
this filing.

Dated: August 17, 2022

By: /s/ Sonal N. Mehta
Sonal N. Mehta